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MOSER LAW FIRM, P.C.



February 26, 2021

VIA ECF

Hon. Cheryl L. Pollak, USMJ
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Fuentes v. GGNGJG Enterprises, Inc.*, 19-cv-7113(GRB)(CP)

Dear Judge Pollak:

I represent the Plaintiff in the above referenced action. On January 13, 2021 the parties reached a settlement in the above referenced matter. More specifically, the parties reached a settlement in the amount of \$78,000.000 to be paid in six equal installments of \$13,000.00. On January 18, 2021 I received a proposed settlement agreement from counsel for Defendants confirming the settlement amount and payment plan. The most recent version of the settlement agreement was exchanged on February 2, 2021. A copy of this settlement agreement is annexed hereto as Exhibit 1. Since February 2, 2021, however, the Defendants have not proposed any further changes to the agreement or signed the agreement.

On February 2, 2021, the Court directed the parties to submit a settlement agreement on or before February 26, 2021.

Plaintiff hereby submits the attached proposed settlement agreement and requests that the Court schedule a conference so that the settlement reached between the parties may be consummated.

Respectfully submitted,

Steven J. Moser